Daniel A. Frishberg *Pro Se* 

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	)	
In re:	)	Chapter 11
	)	
CELSIUS NETWORK LLC, et al.,	)	Case No. 22-10964 (MG)
	)	
Debtors.	)	(Jointly Administered)
	)	

# DANIEL A. FRISHBERG' RESPONSE/OBJECTION TO SECURITIES PLAINTIFFS' LIMITED OBJECTION TO CONFIRMATION OF THE JOINT CHAPTER 11 PLAN OF REORGANIZATION OF CELSIUS NETWORK LLC AND ITS DEBTOR AFFILIATES

Daniel A. Frishberg ("Mr. Frishberg") hereby respectfully submits this response (the "Response") to the Securities Plaintiff' Limited Objection To Confirmation Of The Joint Chapter 11 Plan Of Reorganization Of Celsius Network LLC And Its Debtor Affiliates (Dkt. No. 3544, the "Objection").

#### **Argument**

The Securities Plaintiff's Limited Objection is untimely, and as such should be disregarded. They missed the deadline to file an objection by almost an hour (*See Exhibit A*, and *Exhibit B* below).

#### Exhibit A:

#### Exhibit B<sup>1</sup>:

Plan Objection Deadline. The deadline for filing objections to the Plan is September 22, 2023 at 4:00 p.m., prevailing Eastern Time (the "Plan Objection Deadline").

### **CONCLUSION**

For the aforementioned reasons, the Securities Plaintiff's Objection should be **OVERRULED** with prejudice, and dismissed due to missing the deadline by almost an hour.

Respectfully submitted,

/s/ Daniel A. Frishberg
Daniel A. Frishberg
Pro Se
September 24, 2023

<sup>&</sup>lt;sup>1</sup> See Dkt. No. 3344.